



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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REGIONAL
ADMINISTRATOR'S
DIVISION

May 16, 2022

Colonel Dennis C. Stitt
Idaho Army National Guard
4715 South Byrd Street
Boise, Idaho 83705

Dear Colonel Stitt:

The U.S. Environmental Protection Agency has reviewed Bureau of Land Management and Idaho Army National Guard's April 2022 Draft Environmental Assessment for the Simco Training Area (EPA Project Number 22-0026-BLM). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The EA evaluates the potential environmental impacts associated with military maneuver training activities. The proposed training area is approximately 28,430 acres in size and is located east of Simco Road in Elmore County, Idaho, adjacent to the Orchard Combat Training Center. The EA identifies and evaluates a No Action Alternative and two action alternatives. Alternative A proposes to install 4 miles of new fencing and conduct engineering exercises in undefined boundaries. Alternative B proposes to install 5.9 miles of new fencing, including off-limits fencing around cultural resources, and conduct engineering exercises in pre-defined boundaries. BLM and IDARNG identified Alternative A as the preferred alternative.

EPA has identified environmental concerns, as well as recommendation to address, potential project activity impacts to including range contamination and off-range migration, noise, water quality, and cultural resources. Additional analysis may be required to better assess and quantify these impacts and design appropriate mitigation measures to minimize them. The enclosed Detailed Comments provide greater detail of these and other concerns, as well as recommendations for the Final EA.

Thank you for the opportunity to review the EA for this project. If you have questions about this review, please contact Emily Bitalac of my staff at (206) 553-2581 and bitalac.emily@epa.gov, or me, at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Chief
Policy and Environmental Review Branch

Enclosure

**U.S. EPA Detailed Comments on the
Simco Training Draft EA
Elmore County, Idaho
May 2022**

Range contamination and off-range migration

EPA recommends the FEA further examine the release of toxic materials like lead from blank ammunition. Identify best management practices to reduce the migration of lead and other metals from the range. Identify all pathways for munition to migrate off-range, including but not limited to, air/dust and stormwater runoff/groundwater, and consider exposure pathways for both human and ecological receptors. The DEA states that there may be long-term less than significant adverse impacts, but no site-specific supporting information is provided.

Noise

To avoid and minimize noise impacts, EPA recommends the FEA:

- Disclose the estimated amount of use of the 0.50-caliber blank in the project area and the percentage of time its use would occur during daytime vs. nighttime. The DEA states this is the loudest noise source associated with military training activities with an impulse noise of 130 dBP, which is the threshold for very loud, may startle perceptibility.^{1, 2}
- Address specific impacts to sensitive receptors such as schools and churches as well as impacts to children learning. Consider including a map locating these sensitive receptors.
- Clarify the number of people impacted. The DEA identifies the four closest noise-receptor areas but does not document the number of people impacted in these areas.
- Include potential impacts to livestock, including potential injury to or from livestock startled by noise.
- Consider noise as an environmental justice concern and identify any communities that may be adversely impacted by increased levels of noise.
- Based on the proximity of the community identified as “Noise Receptor 3” in the DEA to Mountain Home Air Force Base (MHAFB), consider cumulative impacts of noise on communities surrounded by both MHAFB and the project area. Coordinate with MHAFB on the timing of training activities to minimize the impacts of noise on the surrounding communities.
- Conduct meaningful engagement with local communities and stakeholders in the affected areas and discuss concerns regarding noise and cumulative impacts.

Water Quality

EPA recommends the FEA include water quality as a topic in the affected environment and environmental concerns section. The DEA states that the project area contains Waters of the United States and that those areas would be off-limits for training activities.³ EPA recommends the FEA:

- Include a map of the location of the waters, including wetlands and intermittent/ephemeral streams, in the project area.
- Include acreages and channel lengths, habitat types, values, and functions of these waters.

¹ DEA page 3-33

² DEA page 3-29

³ DEA page 1-16

- Define the distance for “off-limits” by identifying buffers around the waters/wetlands where training activities cannot occur, especially in the case of Alternative A where no off-limit areas exist for 5-acre dig sites.
- Include mitigation plans, including compensatory mitigation required under the CWA, to reduce impacts to Waters of the U.S., such as impacts from the release of toxins from blank ammunition discussed above.
- Provide information on activities occurring in floodplains and steps to reduce floodplain impacts and risks. Activities affecting floodplains are subject to *Executive Order 11988: Floodplain Management* and *Executive Order 13690: Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*. Floodplains perform a vital function of conveying and dissipating the volume and energy of peak surface runoff flows downstream. Periodic flood flows form and sustain specific habitat types, such as wetland and riparian areas.

Climate Change

EPA recommends the FEA identify potential wildfire hazards associated with the proposed training activities and mechanisms to avoid, mitigate, and minimize the wildfire risks. Also create wildfire response plans in the event of fire. Many types of ammunition can cause ignition under the right conditions.^{4,5} Further, Elmore County receives a “relatively moderate” score of 24.47 for wildfire per the FEMA National Risk Index. Elmore County has also been determined to have relatively low ability to prepare for anticipated natural hazards, adapt to changing communities, and withstand and recover rapidly from disruptions when compared to the rest of the US (76.7% of US counties have a higher Community Resilience; 47.8% of counties in Idaho have a higher Community Resilience).⁶

Cultural Resources

The DEA identifies six archeological sites eligible for listing under the National Register of Historic Places in the project area. Alternative A and B both create off-limit areas associated with the cultural protection plan, but Alternative B fences these areas. The DEA states that impacts to cultural resources are the same for Alternative A and B;⁷ EPA recommends the project impacts analysis consider how fencing these off-limit areas may better protect the cultural resources.

EPA appreciates IDARNG initiating government-to-government consultation and outlining these meetings in the DEA. EPA recommends the FEA include any updates on tribal consultation that may have occurred after DEA preparation.

⁴ <https://fire.nv.gov/uploadedFiles/firenv.gov/content/bureaus/FPL/Shooting%20and%20Fire%20Safety%202021.pdf>.

⁵ https://www.fs.fed.us/rm/pubs/rmrs_rp104.pdf.

⁶ <https://hazards.fema.gov/nri/map>.

⁷ DEA page 3-86